

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Robert Half Inc.,

Civil Action No. _____

Plaintiff,

v.

COMPLAINT

Robert Half Management Resources
Corp and Kyle Brooks.

Defendants.

Plaintiff Robert Half Inc. (“RHI” or “Plaintiff”), for its claims against Defendants Robert Half Management Resources Corp (“RHMRC”) and Kyle Brooks (“Brooks”; collectively with RHMRC, “Defendants”) states and alleges as follows:

NATURE OF THE ACTION

1. This is an action for trademark infringement, dilution, unfair competition, and deceptive trade practices. The claims alleged in this Complaint arise under the Lanham Act, 15 U.S.C. § 1051, *et seq.*, Minnesota statutes, and common law.

2. This action arises from Defendants’ unauthorized and willful misappropriation of RHI’s famous and distinctive ROBERT HALF trademark for its employment agency, recruitment, and consulting services, thus causing harm to RHI and consumers.

3. Specifically, Brooks registered RHMRC with the Minnesota Secretary of

State as a Minnesota corporation under the name “Robert Half Management Resources Corp,” which name contains RHIs’ registered trademark, ROBERT HALF.

4. Upon information and belief, Defendants have improperly registered, operated ,and continue to operate a company with a name that is virtually identical to RHI’s corporate name and registered trademark ROBERT HALF, all to the irreparable harm of RHI and consumers who will undoubtedly believe that the goods and services offered by RHMRC originate from RHI or are in some way authorized or sponsored by RHI, when they are not.

5. By filing this action, RHI seeks injunctive relief and damages arising from RHMRC’s and Brooks’ ongoing brazen and willful infringement of the ROBERT HALF mark in the United States, including the State of Minnesota and this District.

THE PARTIES

6. RHI is a Delaware corporation having its principal place of business at 2884 Sand Hill Road, Menlo Park, California 94025.

7. RHMRC is a Minnesota corporation having a registered office address which, upon information and belief, is also its principal place of business at 6030 Main Street NE, Unit 406, Fridley, Minnesota 55432-2870.

8. Brooks is an individual who organized RHRMC as a Minnesota corporation and, upon information and belief, resides at 6030 Main Street NE, Unit 406, Fridley, Minnesota 55432-2870.

JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction over RHI’s claims for federal

trademark infringement and unfair competition under 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331, 1338, and supplemental jurisdiction over RHI's state and common law claims for trademark infringement, dilution, and deceptive trade practices under 28 U.S.C. § 1367.

10. This Court also has diversity jurisdiction over RHI's claims pursuant to 28 U.S.C. § 1332 because there is complete diversity between the parties and the amount in controversy is in excess of \$75,000 exclusive of interest and costs.

11. Upon information and belief, Brooks resides in and RHMRC conducts business in this judicial district, have engaged in and continues to engage in infringing conduct in this judicial district, and are subject to personal jurisdiction in this judicial district.

12. Venue is proper in this judicial district under 28 U.S.C. § 1391 because all or a substantial part of the events giving rise to the claims occurred in this District.

FACTS

RHI's Federal Trademarks

13. RHI is one of the world's largest specialized employment staffing agencies. Since its founding in 1948, RHI has provided its clients with skilled professionals in the fields of accounting and finance, technology, legal, creative, marketing and administration. RHI has more than 400 consulting and staffing locations throughout the world and employs over 10,000 employees. During this time, RHI has used the name and mark ROBERT HALF alone or in combination with other words and/or design elements in connection with RHI's various employment placement, consulting and staffing




services.



14. During this same time period, RHI has successfully obtained numerous trademark registrations for its marks incorporating ROBERT HALF in jurisdictions around the globe, including but not limited to Argentina, Australia, Brazil, China, Canada, the EU, Japan, New Zealand, Singapore, UAE, and the United States.





15. RHI has duly registered its name and mark ROBERT HALF in the United States Patent and Trademark Office. A representative sample of these U.S. registrations are set forth in the chart below:

MARK	Registration Date	Registration Number	Services
ROBERT HALF	6/2/1981	1156612 Incontestable	Class 35: Employment Agency Services
ROBERT HALF	1/18/2022	6622283	Class 35: Providing temporary, full-time and contract employment placement staffing; Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services in the fields of accounting, finance, legal services, technology, and the creative industry; providing information on employment, careers and temporary staffing via a global computer network.; Employment staffing in the field of electronic discovery; operation of telephone call centers for others; business project management services; providing online business risk management services for use in project management; providing business intelligence services; back office support, namely, office administrative services for others for supporting law firms, legal service providers and in-house legal departments; business consulting services for others, namely, for supporting law firms, legal service providers and in-house legal departments; Business consulting services in the nature of managed solutions, namely, integrating enterprise level operations management, specialized employment staffing and recruitment, organizational learning, and business process integration and technology deployment; Business consulting services in the fields of accounting, finance, legal services, technology, and the creative industry, in the nature of managed solutions, namely,

			integrating enterprise level operations management, specialized employment staffing and recruitment, organizational learning, and business process integration and technology deployment; Business services, namely, matching employers and businesses with candidates for temporary staffing and full-time and contract employment placement opportunities; Business services, namely, matching employers and businesses in the fields of accounting, finance, legal services, technology, and the creative industry, with candidates for temporary staffing and full-time and contract employment placement opportunities; business services, namely, providing an artificial intelligence-based searchable database that matches employers, businesses, and other third parties with candidates for temporary staffing and full-time and contract employment placement opportunities via a global computer network and via mobile applications; business services, namely, providing an artificial intelligence-based searchable database that matches employers, businesses, and other third parties in the fields of accounting, finance, legal services, technology, and the creative industry, with candidates for temporary staffing and full-time and contract employment placement opportunities via a global computer network and via mobile applications.
ROBERT HALF	1/18/2022	6622284	Class 36: Real estate services, namely, rental of office space
ROBERT HALF	1/18/2022	6622285	Class 42: Computer project management services; computer forensic services; computer services, namely, remote management of the information technology (IT) systems of others; technical support services, namely, remote infrastructure management services for monitoring, administration and management of software, cloud computing IT and application systems; consulting in the field of remote configuration management for computer hardware; periodic upgrading of computer software for others; design and development of software in the field of mobile applications; computer technical support services, namely, 24/7 service desk or help desk services for IT infrastructure, operating systems, database systems, and web applications; website design and development for others
ROBERT HALF	1/18/2022	6622286	Class 45: Electronic discovery and litigation support and consulting services for others, namely, legal support services in the nature of collection and analysis of

			electronic documents; Regulatory compliance auditing; Legal compliance auditing; Regulatory compliance consulting in the fields of financial regulations, technology, data security, data privacy and information governance
ROBERT HALF	6/27/2023	7089856	Class 36: Provision of project space, namely, rental of office space Class 43: Provision of meeting facilities, namely, conference and exhibition facilities
rh Robert Half Logo (Red) 	2/11/2014	4482350 Incontestable	Class 35: Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services; providing information on employment, careers and temporary staffing via a global computer network
rh Robert Half Logo (Red) 	11/23/2021	6564900	Class 35: Employment staffing in the field of electronic discovery; operation of telephone call centers for others; business project management services; business risk management; providing online business risk management services for use in project management; providing business intelligence services; back office support, namely, office administrative services for others for supporting law firms, legal service providers and in-house legal departments; business consulting services for others, namely, for supporting law firms, legal service providers and in-house legal departments
rh Robert Half Logo (Red) 	1/18/2022	6622287	Class 35: Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services in the fields of accounting, finance, legal services, technology, and the creative industry; Business consulting services in the nature of managed solutions, namely, integrating enterprise level operations management, specialized employment staffing and recruitment, organizational learning, and business process integration and technology deployment; Business consulting services in the fields of accounting, finance, legal services, technology, and the creative industry, in the nature of managed solutions, namely, integrating enterprise level operations management, specialized employment staffing and recruitment, organizational learning, and business process integration and technology deployment; Business services, namely, matching employers and businesses with candidates for temporary staffing and full-time and contract employment placement opportunities; Business services, namely, matching employers and businesses in the fields of

			accounting, finance, legal services, technology, and the creative industry, with candidates for temporary staffing and full-time and contract employment placement opportunities; business services, namely, providing an artificial intelligence-based searchable database that matches employers, businesses, and other third parties with candidates for temporary staffing and full-time and contract employment placement opportunities via a global computer network and via mobile applications; business services, namely, providing an artificial intelligence-based searchable database that matches employers, businesses, and other third parties in the fields of accounting, finance, legal services, technology, and the creative industry, with candidates for temporary staffing and full-time and contract employment placement opportunities via a global computer network and via mobile applications
rh Robert Half Logo (Red)  Robert Half	1/18/2022	6622288	Class 45: Regulatory compliance auditing; Legal compliance auditing; Regulatory compliance consulting in the fields of financial regulations, technology, data security, data privacy and information governance
ROBERT HALF DIRECT	3/31/2020	6025516	Class 35: Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services; providing temporary, full-time and contract employment placement staffing, consulting and recruiting services via a global computer network and via mobile applications; providing information on employment, careers and temporary staffing; and providing information on employment, careers and temporary staffing via a global computer network and via mobile applications
rh Robert Half Direct Logo  Robert Half Direct	3/31/2020	6025515	Class 35: Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services; providing temporary, full-time and contract employment placement staffing, consulting and recruiting services via a global computer network and via mobile applications; providing information on employment, careers and temporary staffing; and providing information on employment, careers and temporary staffing via a global computer network and via mobile applications
rh Robert Half Executive Search Logo	5/4/2021	6232708	Class 35: Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services; providing temporary, full-time and contract employment placement staffing,

			consulting and recruiting services via a global computer network and via mobile applications; providing information on employment, careers and temporary staffing; and providing information on employment, careers and temporary staffing via a global computer network and via mobile applications
rh Robert Half Management Resources Logo 	5/6/2014	4527041 Incontestable	Class 35: Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services and providing information on employment, careers and temporary staffing via a global computer network
rh Robert Half Technology Logo 	5/6/2014	4527042 Incontestable	Class 35: Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services and providing information on employment, careers and temporary staffing via a global computer network
rh Robert Half Finance & Accounting Logo 	5/6/2014	4527043 Incontestable	Class 35: Providing temporary, full-time and contract employment placement staffing, consulting and recruiting services and providing information on employment, careers and temporary staffing via a global computer network

16. The above listed registrations are currently valid, subsisting, and in full force and effect, and are registered on the Principal Register of the United States Patent and Trademark Office. Registration Nos. 1,156,612, 4,482,350, 4,527,041, 4,527,042, and 4,527,043 are incontestable pursuant to 15 U.S.C. § 1065, and constitute prima facie evidence of their validity, RHI's ownership, and its exclusive right to use these marks. The trademarks identified in the chart above are collectively referred to herein as the "RHI Marks." Copies of the Certificates of Registration for the above-referenced RHI Marks are collectively attached hereto as **Exhibit 1**.

17. The RHI Marks have been extensively and continuously advertised and promoted by RHI within the United States and indeed, worldwide. Substantial amounts of time, effort, and money have been expended over the years in ensuring that the public

associates such marks exclusively with RHI.

18. At the end of 2024, RHI operated six (6) office in Minnesota in Bloomington, Burnsville, Minneapolis, Minnetonka (Plymouth), St. Cloud, and St. Paul.

19. Since 1995, RHI has maintained the internet domain of <https://www.roberthalf.com/>. This domain is an interactive website that connects the user with a description of RHI's services, including tailored resources to common inquiries in the staffing services space.

20. When inputting "Robert Half" into a commonly used search engine, such as Google, RHI's website is the first result.

21. RHI's website operates within the United States and is accessible to Minnesota residents.

22. RHI also promotes its services through social media and third-party job boards. Specifically, RHI maintains a presence on multiple platforms such as CareerBuilder, LinkedIn, Facebook, Instagram, and X. Users on these platforms are able to access RHI's profile, which includes a link to its aforementioned website, descriptions of RHI's services, products, and testimonials, among other resources.

23. As a result of the time, effort, and money invested in its business and in its RHI Marks, RHI has earned a reputation for excellence in the rendering of its employment and staffing services. Indeed, in 2000, RHI became the first staffing and employment services firm to be added to Standard & Poor's S&P 500 index. Over the three (3) year period ending in 2024, RHI rendered services, many of which are ROBERT HALF-branded services, that exceeded five billion, seven hundred million U.S.

dollars (\$5,700,000,000) in revenues annually.

24. Together with its reputation for excellence, RHI enjoys tremendous goodwill in its trademarks and service marks, including but not limited to the RHI Marks.

25. RHI and its RHI Marks have been prominently featured in advertisements and promotions throughout the world, including domestic and foreign publications and philanthropic events. RHI has received many prestigious awards as a result of, in part, its services marketed and rendered under the RHI Marks, including being named to Fortune magazine's "Most Admired Companies" list every year since 1998, being named "America's Best Professional Recruiting Firm" by Forbes from 2018-2024, being named one of "America's Best Executive Recruiting Firms" by Forbes from 2017-2024, being named one of "America's Best Temporary Staffing Firm" by Forbes from 2021-2024, and being recognized by The Wall Street Journal as one of the "World's Most Sustainably Managed Companies" in 2021.

26. Because of the extensive scope of the services rendered and the substantial sums spent to advertise the products and services under the RHI marks, such marks have acquired strong secondary meaning in the minds of the consuming public and are now highly distinctive, famous, and serve uniquely to identify RHI's products and services. Through widespread and favorable public acceptance and recognition, the RHI Marks have become assets of incalculable value as symbols of RHI's business, products, and services.

27. RHI is traded on the New York Stock Exchange and is a member of the Standard & Poor's S&P 500 Index.

Defendants' Infringing Conduct

28. On or around July 22, 2024, Brooks filed RHMRC's Registration as a Business Corporation (Domestic) with the Minnesota Secretary of State. A copy of the RHMRC's Registration is attached hereto as **Exhibit 2**.

29. RHMRC's Minnesota Business Corporation registration lists its name as "Robert Half Management Resources Corp."

30. RHMRC's Minnesota Business Corporation registration lists its mailing address as 6030 Main Street NE, Unit 406, Fridley, Minnesota 55432-2870.

31. Brooks is listed as the Registered Agent for RHMRC.

32. RHI did not initiate or authorize, license, or otherwise permit Brooks or RHMRC to file a Business Corporation (Domestic) registration for a business name using ROBERT HALF in any portion of its name.

33. RHI did not become aware of RHMRC's filing until November 2024.

34. Consumers encountering the name "Robert Half Management Resources Corp" in the marketplace will undoubtedly be confused into believing that Defendant RHMRC's good and/or services emanate from RHI or that its good and/or services are authorized or sponsored by RHI, when they are not.

35. Given Brooks' registration of "Robert Half Management Resources Corp," a name incorporating and comprised of the entirety of the ROBERT HALF mark, neither Brooks nor RHMRC can have any legitimate purpose for this registration, and upon information and belief, Defendants have done so for the sole purpose of confusing consumers – which will harm RHI's business, including its reputation and goodwill in the

marketplace.

36. Upon information and belief, at Brooks' direction, RHMRC is offering goods and services using the RHI Marks in violation of the Trademark Act, 15 U.S.C. § 1114(1), *et seq.*, and the common law, that are intended to cause and are likely to cause confusion among consumers and the trade.

37. Upon information and belief, Brooks and RHMRC have and are brazenly and willfully infringed upon the RHI Marks and traded off the stellar reputation and goodwill associated therewith.

38. Upon information and belief, Brooks registered the name "Robert Half Management Resources Corp" to evoke the RHI Marks in the minds of consumers and cause confusion.

39. On November 13, 2024, in an attempt to resolve this matter amicably, RHI sent a letter to Brooks and RHMRC requesting the company cease and desist its unauthorized use of RHI's company name and the RHI Marks with a deadline of December 4, 2024 to respond. A true and correct copy of this letter is attached hereto as **Exhibit 3**.

40. Brooks and RHMRC did not respond to RHI's November 13, 2024 letter, and as a result, RHI had no choice but to initiate this action requesting, among other relief, actual damages, disgorgement of RHMRC's profits, an award of treble damages, and attorneys' fees as well as an injunction and destruction of all infringing products, labels, packaging, promotional materials, and advertising.

COUNT I
(Federal Trademark Infringement)
(Violation of 15 U.S.C. § 1114)

41. Plaintiff restates and realleges the foregoing allegations as if set forth fully herein.

42. The Defendants' unauthorized use of the RHI Marks, including but not limited to Registration Nos. 1,156,612 and 6,522,283, as alleged herein, is likely to cause confusion, mistake, or deception as to the source, sponsorship, or approval of Defendants' good and services by RHI. The consuming public and the trade are likely to believe that Defendants' good and/or services originate with RHI, are licensed, sponsored, or approved by RHI, or are in some way connected with or are related to RHI, when they are not, in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

43. Defendants' unauthorized and infringing use of the RHI Marks, as alleged herein, constitutes intentional and willful infringement of RHI's rights in and to its federally-registered RHI Marks in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

44. Upon information and belief, the infringing acts and conduct have occurred in interstate commerce including within the State of Minnesota and this District.

45. The Defendants' actions entitle RHI to monetary relief under 15 U.S.C. § 1117.

46. As a result of the Defendants' willful trademark infringement, RHI has suffered loss and damages in an amount to be determined at trial. RHI is entitled to recover the Defendants' profits attributed to its infringing activities. RHI is entitled to

attorneys' fees and costs incurred in this action. RHI is also entitled to permanent injunctive relief, enjoining the Defendants from further and continuing violations of 15 U.S.C. § 1114.

COUNT II
(Federal Unfair Competition)
(Violation of 15 U.S.C. § 1125(a))

47. Plaintiff restates and realleges the foregoing allegations as if set forth fully herein.

48. The Defendants' unauthorized use of the RHI Marks, including but not limited to Registration Nos. 1,156,612 and 6,522,283, as alleged herein, upon information and belief, constitutes use of a false designation of origin and false or misleading representation in interstate commerce, which wrongly and falsely designates. Such use describes and represents the origin of Defendants' goods and services as originating from or being connected with RHI, and is likely to cause confusion, cause mistake, or to deceive as to Defendants' affiliation, connection, or association with RHI, or as to the origin, sponsorship, or approval of Defendants' good and services by RHI, in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

49. Upon information and belief, these acts and conduct have occurred in interstate commerce including within the State of Minnesota and this District.

50. As a result of the Defendants' willful conduct, RHI has suffered loss and damage in an amount to be determined at trial. RHI is entitled to recover the Defendants' profits attributed to Defendants' unlawful activities. RHI is entitled to attorneys' fees and costs incurred in this action. RHI is further entitled to permanent injunctive relief

enjoining the Defendant from further and continuing violations of 15 U.S.C. § 1125(a).

COUNT III
(Minnesota Unlawful Trade Practices)
(Violation of Minn. Stat. § 325D.13)

51. Plaintiff restates and realleges the foregoing allegations as if set forth fully herein.

52. The Defendants' company name, "Robert Half Management Resources Corp" fully incorporates most of RHI's corporate name "Robert Half Inc." and the federally registered mark "ROBERT HALF," and thus, is nearly identical in a manner that can, and upon information and belief, is intended to deceive consumers, and constitutes unlawful trade practices in violation of Minn. Stat. § 325D.13.

53. Upon information and belief, the Defendants' unlawful trade practices have occurred in the State of Minnesota and this District.

54. RHI has been damaged and/or is and will be threatened with loss, damage, or injury by reason of the Defendants' unlawful trade practices unless enjoined.

55. As a result of the Defendants' violation of Minn. Stat. § 325D.13, RHI has suffered loss and damage in an amount to be determined at trial. RHI is entitled to attorneys' fees and costs incurred in this action. RHI is entitled to preliminary and permanent injunctive relief, enjoining the Defendant from further and continuing violations of Minn. Stat. § 325D.13.

COUNT IV
(Minnesota Deceptive Trade Practices)
(Violation of Minn. Stat. § 325D.43, *et. seq.*)

56. Plaintiff restates and realleges the foregoing allegations as if set forth fully

herein.

57. RHMRC's company name, "Robert Half Management Resources Corp" fully incorporates most of RHI's corporate name "Robert Half Inc." and the federally registered mark "ROBERT HALF" which is a "Trademark" as defined in Minn. Stat. § 325D.43, subd. 7.

58. The Defendants' unauthorized use of the words "ROBERT HALF" is likely to cause confusion or misunderstanding as to the source, origin, sponsorship or approval of the Defendants' goods and/or services by RHI, all in violation of the Minnesota Deceptive Trade Practices Act, Minn. Stat. § 325D.44.

59. Upon information and belief, the Defendants' deceptive trade practices have occurred in the State of Minnesota and this District.

60. Upon information and belief, the Defendant acted deliberately and willfully in its unauthorized use of RHI's Marks and the "ROBERT HALF" trademark.

61. RHI is likely to be damaged by the Defendants' deceptive trade practices unless enjoined.

62. As a result of Defendants' violation of the Minnesota Deceptive Trade Practices Act, RHI has suffered loss and damage in an amount to be determined at trial. RHI is entitled to attorneys' fees and costs incurred in this action. RHI is entitled to preliminary and permanent injunctive relief, enjoining the Defendant from further and continuing violations of the Minnesota Deceptive Trade Practices Act.

COUNT V
(Dilution under Minnesota Law)
(Violation of Minn. Stat. § 333.285)

63. Plaintiff restates and realleges the foregoing allegations as if set forth fully herein.

64. The RHI Marks, including “ROBERT HALF,” are distinctive and famous in Minnesota.

65. The Defendants’ use of “ROBERT HALF” on and in connection with Defendants’ goods and/or services began after the RHI Marks and “ROBERT HALF” in particular became famous in Minnesota.

66. The Defendants’ unauthorized use of the RHI Marks and “ROBERT HALF” on and in connection with Defendants’ goods and/or services is causing dilution of the distinctive quality of the RHI Marks, “ROBERT HALF” in particular.

67. Upon information and belief, the Defendant acted deliberately and willfully in intending to trade off RHI’s reputation or to cause dilution of its distinctive and famous marks.

68. RHI is likely to be damaged by the s dilution of its distinctive and famous marks unless enjoined.

69. As a result of the Defendants’ violation of Minn. Stat. § 333.285, RHI has suffered loss and damage in an amount to be determined at trial. RHI is entitled to attorneys’ fees and costs incurred in this action. RHI is entitled to preliminary and permanent injunctive relief, enjoining the Defendant from further and continuing violations of Minn. Stat. § 333.285.

COUNT VI
(Common Law Trademark Infringement)

70. Plaintiff restates and realleges the foregoing allegations as if set forth fully herein.

71. The Defendants' unauthorized use of "ROBERT HALF," as alleged herein, is likely to cause confusion, mistake, or deception as to the source, sponsorship, or approval of Defendants' good and services by RHI. The consuming public and the trade are likely to believe that Defendants' good and/or services originate with RHI, are licensed, sponsored, or approved by RHI, or are in some way connected with or are related to RHI, when they are not, in violation of Minnesota common law regarding trademark infringement.

72. As a direct and proximate result of the likelihood of confusion, mistake or deception caused by the Defendants' unlawful use of "ROBERT HALF," RHI has suffered and will continue to suffer irreparable harm if the Defendants' unlawful conduct is not enjoined.

73. The Defendants' actions entitle RHI to monetary relief in an amount to be determined at trial.

COUNT VII
(Common Law Unfair Competition)

74. Plaintiff restates and realleges the foregoing allegations as if set forth fully herein.

75. The Defendants' unauthorized use of "ROBERT HALF," as alleged herein, is likely to cause confusion, mistake, or deception as to the source, sponsorship, or

approval of Defendants' good and services by RHI. The consuming public and the trade are likely to believe that Defendants' good and/or services originate with RHI, are licensed, sponsored, or approved by RHI, or are in some way connected with or are related to RHI, when they are not, constituting unfair competition under Minnesota common law.

76. As a direct and proximate result of the Defendant engaging in such unfair competition, RHI has suffered and will continue to suffer irreparable harm if the Defendants' conduct is not enjoined.

77. The Defendants' actions entitle RHI to monetary relief in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment:

A. Preliminarily and permanently enjoining Defendant, its agents, representatives, employees, assigns and suppliers, and all persons acting in concern of privity with it, from using the RHI Marks, or any other mark, which is likely to cause confusion, to cause mistake, or dilute the distinctiveness of the RHI Marks, or from otherwise infringing the RHI Marks, or from competing unfairly with RHI;

B. Directing the destruction of all infringing advertising, merchandise and molds and means of producing the same;

C. Directing the Secretary of State of the State of Minnesota to deregister "Robert Half Management Resources Corp";

D. Awarding RHI its damages and Defendants' profits derived by reason of the

unlawful acts complained of herein as provided by law;

E. Deeming the case exceptional and awarding RHI its attorney fees pursuant to 15 U.S.C. § 1117, Minn. Stat. § 325D.45, and Minn. Stat. § 333.29;

F. An order prohibiting Defendant from continued infringement of the RHI Marks, by use of the words “ROBERT HALF”; and

G. For such other and further relief as the court may deem just and equitable.

Respectfully Submitted,

Date: March 20, 2025

/s/ Christopher A. Young

Christopher A. Young (#288998)

Daniel J. Ballintine (#256584)

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